

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

Jane Doe,

Plaintiff,

v.

NBCUniversal Media, LLC; Apple Inc.; and John Does 1–60,

Defendants.

Case No.: 1:25-cv-05690-JPO

**Plaintiff's Response to July 15, 2025 Order / Request for Brief Stay**

Dear Judge Oetken:

I write in response to the Court's July 15, 2025 Order regarding my motion to proceed pseudonymously. While I understand the Court's denial, I respectfully request a **brief 14-day stay** to assess next steps, allow for potential resolution discussions, and retain litigation counsel.

My intent in filing this complaint was not for publicity or disruption, but to seek accountability for what I believe to be serious and ongoing retaliatory conduct. While the docket entry is now public, I have not submitted any supporting evidence or sealed appendices—both of which contain highly sensitive material, including issues affecting child safety and third-party privacy.

At this stage, I remain open to engaging in a meaningful discussion regarding resolution through my legal counsel. For clarity, my counsel has not entered an appearance in this action but has represented me in the underlying employment matters.

I also wish to clarify the following for the Court:

- I remain a current employee of NBCUniversal.
- The NSA reference in the complaint was solely based on a FOIA response dated June 25, 2025, in which the agency issued a Glomar reply. I did not intend to imply any allegation against that agency.
- My claims center on unauthorized surveillance and digital interference, supported by forensic evidence not yet submitted to the Court. These include suspicious enterprise-level configurations tied to corporate infrastructure and Apple device profiles. Apple is referenced strictly in its role as a platform provider, following a legal preservation request submitted to the company in early June.
- The complaint also references digital artifacts—such as misattributed metadata and anomalous configurations—which I believe were introduced to escalate the matter or create false pretext. These will be substantiated if and when I submit the full evidentiary appendices.
- Despite multiple outreach attempts, I have been unable to obtain protection or response from relevant federal and local agencies. These events have had a significant personal and legal impact and involve matters of child safety and physical security.

The requested stay would allow me to determine whether amendment, withdrawal without prejudice, or continued litigation is the most appropriate path forward. It would also provide necessary time to formally retain litigation counsel. I reserve all rights available under the Federal Rules of Civil Procedure, including the right to refile or amend.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Jane Doe

Jane Doe

Plaintiff pro se

legalreview2025@proton.me

July 21, 2025